

## REMARKS

Claims 7, 9, 11, 15, 18-20, 22, 26-27 and 29-41 are pending. Claims 7, 9, 11, 15, 26-27 and 32-41 stand rejected under 35 USC § 103(a) as being unpatentable over U.S. Patent No. 6,125,391 to Meltzer et al. in view of U.S. Patent No. 6,772,396 to Cronin et al. and Heskett ("An XML standard for directory services?"). Claims 18-20, 22 and 29-31 are rejected under 35 USC 103(a) as being unpatentable over U.S. Patent No. 6,125,391 to Meltzer et al. in view of U.S. Patent No. 6,772,396 to Cronin et al., Heskett ("An XML standard for directory services?"), and U.S. Patent No. 6,622,170 to Harrison et al.

Reconsideration is requested. No new matter is added. The specification is amended. Claims 7, 9, 11, 15, 18-20, 22, 26-27, and 29-41 remain in the case for consideration. The Examiner is requested to treat any changes to the claims not reflected as strikethrough or underline text as inadvertent typographical errors.

The undersigned thanks the Examiner for correcting the mailing address for this patent application.

## REJECTIONS UNDER 35 U.S.C. § 103(a)

Claim 7 is directed toward a software program for facilitating the use of a distributed directory running in a computer network, the program comprising being stored on a recordable medium and including instructions for: receiving an event from the distributed directory into an XML generator, the distributed directory including a reference to at least one resource on one of at least two computers on the computer network, the event representing a change to the distributed directory; converting the event into XML data representing the event; transforming the XML data representing the event to a first predetermined format by a transformation processor using a first stylesheet, the first predetermined format being responsive to a first application running in the computer network; transmitting the transformed XML data representing the event to the first application; transforming the XML data representing the event to a second predetermined format by the transformation processor using a second stylesheet, the second predetermined format being responsive to a second application running in the computer network; and transmitting the transformed XML data representing the event to the second application.

Claim 15 is directed toward a software program for facilitating the use of a distributed directory running in a computer network, the program comprising instructions for: receiving a first event from a first application in a first native application format, the first event representing a first change to the distributed directory; converting the first event into markup

language data; transforming the first event to a predetermined format by a transformation processor using a transformation profile, the predetermined format being responsive to the distributed directory, the transformation profile including formatting instructions for transforming the markup language data to the predetermined format, the distributed directory including a reference to at least one resource on one of at least two computers on the computer network; transmitting the transformed first event to the distributed directory; receiving a second event from a second application in a second native application format, the second event representing a second change to the distributed directory; converting the second event into markup language data; transforming the second event to the predetermined format by the transformation processor using the transformation profile; and transmitting the transformed second event to the distributed directory.

Claim 18 is directed toward a distributed computer system comprising: a first processor connected to a network for executing computer code; a second processor connected to the network for executing computer code; a first memory connected to the first processor; a second memory connected to the second processor; a distributed directory, wherein first and second portions of the distributed directory are stored in the first memory and the second memory, respectively; a first application, a portion of which being stored in one of the first memory and the second memory; a second application, a portion of which being stored in one of the first memory and the second memory; a first transformation profile defining a first predetermined format for use by the first application; a second transformation profile defining a second predetermined format for use by the second application; software for detecting a directory event in the distributed directory, the directory event representing a change to the distributed directory; software for transforming the directory event to the first predetermined format by using a generic transformation tool and the first transformation profile; software for transforming the directory event to the second predetermined format by using the generic transformation tool and the second transformation profile; software for providing to the first application the directory event transformed to the first predetermined format; and software for providing to the second application the directory event transformed to the second predetermined format.

Claim 32 is directed toward a method for interfacing with a distributed directory in a computing system, comprising: providing a first transformation profile defining a first predetermined format for use by a first application; providing a second transformation profile defining a second predetermined format for use by a second application; detecting an event in the distributed directory, the distributed directory including a reference to at least one

resource on one of at least two computers on the computer network, the event representing a change to the distributed directory; transforming the event to the first predetermined format by using a transformation tool and the first transformation profile; transforming the event to the second predetermined format by using the transformation tool and the second transformation profile; providing to the first application the event transformed to the first predetermined format; and providing to the second application the event transformed to the second predetermined format.

Claim 40 is directed toward a driver infrastructure for interfacing a distributed directory and applications comprising: a generator to receive a directory event from the distributed directory and to generate a generic data for the directory event, the distributed directory including a reference to at least one resource on one of at least two computers on a computer network, the directory event representing a change to the distributed directory; a first transformation profile defining a first predetermined format for use by a first application; a second transformation profile defining a second predetermined format for use by a second application; a transformation processor to transform the generic data for the directory event into a first application data for the first application using the first transformation profile and to transform the generic data for the directory event into a second application data for the second application using the second transformation profile; and a transmitter to transmit the first application data to the first application and to transmit the second application data to the second application.

In contrast, Meltzer teaches market makers using documents in trading partner network. As shown in FIG. 15, Meltzer receives documents via a communications agent. The documents can be in any syntax. Meltzer converts the documents to XML, then uses an XML parser to verify that the documents are properly formatted in XML. Using the business interface definition compiler (BIDC), the documents are compiled into Java documents. The Java documents are then delivered to the enterprise solutions using the document service.

The Examiner relies on Cronin solely for the concept of stylesheets and transformation profiles, on Heskett for the concepts of a distributed directory and events representing changes to the distributed directory, and on Harrison solely for the concept of portions of the distributed directory being stored in multiple memories. The Applicant believes that none of Cronin, Heskett, and Harrison teaches or suggests any other features of the claimed invention.

In rejecting claim 7, the Examiner indicated that "Meltzer does not teach a distributed directory, [or] an event representing a change to the distributed directory" (Office Action

dated April 12, 2005, page 3, ¶ 6). The Examiner went on to argue that “Heskett teaches using XML as a means to exchange information housed in directories . . . [s]o, a directory retrieves requested data [*sic*] is one type of event in the directory” (*Id.*). The Examiner provides similar reasoning in rejecting independent claims 15, 32, and 40. With respect to claim 18, the Examiner cites to Harrison for the concept of a distributed directory, but appears to still rely on Heskett for the concept of an event representing a change to the distributed directory.

The Applicant respectfully disagrees with the Examiner’s interpretation of Heskett for two reasons. First, Heskett does not teach a distributed directory. Second, Heskett does not teach an event representing a change to the distributed directory. The Applicant’s reasoning is laid out below.

First of all, Heskett does not teach a distributed directory. At best, Heskett teaches directories communicating with each other. This is a far cry from a distributed directory. As argued previously, pages 1-2 of the specification, describe Novell Directory Services (NDS) is an example of a directory service that “provides a logical tree-structure view of all resources on the network so that clients can access them without knowing where they are physically located.” If there were only one computer involved, the client would know the physical location of the resource, but then again, the directory would not be distributed in that situation, either. Thus, a distributed directory involves resources that can be located on any computer in the network. Or in other words, a distributed directory is a directory that spans multiple computers.

In contrast, all Heskett says is that XML can be “a means to exchange information housed in directories”. Nowhere does Heskett use or suggest the concept of “distributed directories”. All Heskett is describing is the concept of directories exchanging information. Every time a person connects from their computer to a web site, there is some exchange of information going on: after all, the files that make up the web site are stored in a directory. But the fact that there is information exchange does not mean that the user’s computer and the web server magically become part of a distributed directory. Establishing a distributed directory requires intent, and it does not occur magically or automatically.

No, all Heskett is describing is directories exchanging information using XML. Because this is distinguishable from distributed directories, the fact that claims 7, 15, 32, and 40 describe distributed directories distinguishes these claims over Heskett. And as the Examiner has admitted that Meltzer fails to teach or suggest the concept of a distributed

directory and Cronin does not teach distributed directories, none of the Meltzer, Cronin, and Heskett teaches or suggests the concept of a distributed directory.

Second, Heskett does not teach or suggest the event representing a change to the distributed directory. Aside from the fact that Heskett fails to teach a distributed directory, Heskett makes no mention of the concept of a change to the distributed directory. As stated above, all Heskett describes is that XML can be used to exchange information. While such an exchange of information might be an "event in the directory", it is not an event "representing a change to the distributed directory".

For the Examiner's reasoning to be valid, two assumptions are needed. First, one has to assume that Heskett is describing a distributed directory. As argued above, this assumption is not valid. Second, one has to assume that the exchange of information is a change to the directory. But using the example of a user browsing the web, the exchange of data in visiting a web site does not necessitate a change to either the user's computer or the server. An exchange of data merely implies the transmission of data: nothing more. Since a change to the distributed directory would mean that there was some "change" and Heskett only describes exchanging information, this assumption also fails. Thus, Heskett fails to teach or suggest an event "representing a change to the distributed directory".

It is also worth noting that Heskett is a news article, not a patent or a published patent application. As such, the supporting description in Heskett is very thin. Any suggestion that Heskett teaches almost anything beyond the literal description in Heskett would fail for reasons of enablement. If all Heskett says is that XML can be used to exchange information, Heskett cannot be argued to teach an event representing a change. Heskett mentions neither events generally, nor events representing a change more specifically (let alone an event representing a change to a distributed directory). As the reason for denying a patent under 35 U.S.C. § 103(a) is because "the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains", the Applicant believes a person of ordinary skill in the art would still need to enable the invention. The thin disclosure of Heskett does not enable describe how someone could use XML as a means to exchange information, let alone events that represent a change to the distributed directory. For this reason, the differences between the claimed invention and the prior art are such that the claimed invention is not obvious over the prior art.

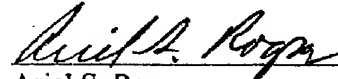
Accordingly, Meltzer, Cronin, and Heskett (possibly in combination with Harrison) fail to teach or suggest the features of the claimed invention, and claims 7, 9, 11, 15, 18-20, 22, and 26-41 are patentable under 35 U.S.C. § 103(a) over Meltzer in view of Cronin and Heskett (and possibly Harrison), and claims 7, 9, 11, 15, 18-20, 22, 26-27, and 29-41 are allowable.

The Applicant hereby presents again the arguments previously presented, which the Applicant believes makes the claims allowable over the cited references.

For the foregoing reasons, reconsideration and allowance of claims 7, 9, 11, 15, 18-20, 22, 26-27, and 29-41 of the application as amended is solicited. The Examiner is encouraged to telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.

Respectfully submitted,

MARGER JOHNSON & McCOLLOM, P.C.



Ariel S. Rogson  
Reg. No. 43,054

MARGER JOHNSON & McCOLLOM, P.C.  
1030 SW Morrison Street  
Portland, OR 97205  
503-222-3613  
Customer No. 45842